

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

United States of America, Plaintiff, v. Dennis E. Hecker, Defendant.	Case No. 0:10-CR-32 (01) JNE/SRN Submitted to the Hon. Michael J. Davis DEFENDANT'S MOTION FOR FURLOUGH AND CLARIFICATION
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Defendant, DENNIS E. HECKER, by and through his undersigned attorney, Brian N. Toder, submits the following in support of his Motion for an Order granting a three-day furlough and for clarification of the Court's ruling respecting an accounting.

The grounds for the motion for furlough are that it will be more efficient for counsel to prepare the assigned accounting with the defendant in 24-hour home incarceration with immediate access to his records. Travel to and from Elk River is time-consuming and expensive. Moreover, the universe of documentation, boxes, emails etc. are voluminous, and the facilities in the Sherburne County jail are limited, as are the available hours.

Clarification is sought as to which law firm is to undertake the accounting. Said another way, will the accounting be paid for by the taxpayers, or will the

accounting be undertaken by the law firm that brought the motion that created a need for the accounting?

Respectfully submitted,

Dated: October 21, 2010

CHESTNUT CAMBRONNE PA

By /s/ Brian N. Toder

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